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Papers Per LR 10-1(b)

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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

NORTHERN DIVISION

In Re:)	CASE NO. 3:11-bk-53706-btb
)	Chapter 11
)	
DHILLON GROUP, LLC)	
dba Holiday Inn Express)	OBJECTION OF UNITED CENTRAL
2902 Michelle Dr.)	BANK TO DECLARATION OF
Sherman, TX 75092)	JAGMOHAN DHILLON IN SUPPORT
)	OF DEBTOR'S OPPOSITION TO
Debtor)	SECURED CREDITOR'S MOTION
)	FOR DISMISSAL FOR IMPROPER
)	VENUE

Date: January 3, 2012
Time: 2:00 p.m.
Est. Time: 30 Mins.

United Central Bank objects to the Declaration of Jagmohan Dhillon in Support of Debtor's
Opposition to Secured Creditor's Motion for Dismissal for Improper Venue (Doc 32) as follows:

1. Paragraph 2:

Best Evidence Objection - There is no documentation attached which establishes Mr.
Dhillon as the managing member. See also, Exh. O to the Request for Judicial Notice filed

1 concurrently herewith.

2 2. Paragraph 4:

3 Best Evidence Objection. There is no documentation attached which establishes Mr.
4 Dhillon as the managing member. See also, Exhs. A and B to the Request for Judicial Notice filed
5 concurrently herewith.

6 3. Paragraph 5:

7 Improper Opinion: The statement regarding the “never center” of the debtor is a
8 statement of opinion, not of fact.

9 Legal Conclusion: The location of the principal place of business is a legal
10 conclusion.

11 Best Evidence Objection: The documents relating to the business of the debtor would
12 be the best evidence of its “nerve center”.

13 4. Paragraph 8:

14 Improper Opinion: The statement regarding the “never center” of the debtor is a
15 statement of opinion, not of fact.

16 Legal Conclusion: The location of the principal place of business is a legal
17 conclusion.

18 Best Evidence Objection: The documents relating to the business of the debtor would
19 be the best evidence of its “nerve center”.

20 5. Paragraph 11:

21 Improper Opinion: The statement regarding the “never center” of the debtor is a
22 statement of opinion, not of fact.

23 Legal Conclusion: The location of the principal place of business is a legal
24 conclusion.

25 Best Evidence Objection: The documents relating to the business of the debtor would
26 be the best evidence of its “nerve center”.

1 6. Paragraph 12:

2 Irrelevant. The term “located” has no meaning in this context.

3 7. Paragraph 13:

4 Improper Opinion: The statement regarding the “never center” of the debtor is a
5 statement of opinion, not of fact.

6 Best Evidence Objection: The documents relating to the business of the debtor would
7 be the best evidence of where its activities are coordinated.

8 8. Paragraph 14:

9 Improper Opinion: The statement regarding the “never center” of the debtor is a
10 statement of opinion, not of fact.

11 Best Evidence Objection: The documents relating to the business of the debtor would
12 be the best evidence of the location of its books.

13 9. Paragraph 15:

14 Irrelevant.

15 10. Paragraph 16:

16 Improper Opinion: The statement regarding the ability of the debtor to function in
17 a specific location is a statement of opinion, not of fact. .

18 11. Paragraph 18:

19 Irrelevant.

20 12. Paragraph 19:

21 Irrelevant.

22 Not a statement of fact.

23 13. Paragraph 20

24 The referenced documents were not attached to the Declaration of Mr. Dhillon and
25 thus are not part of the record before the Court.

26

27

28

1	14. Paragraph 19:
2	Irrelevant.
3	Not a statement of fact.

6 DATED: December 27, 2011

/s/ George C. Lazar
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CERTIFICATE OF SERVICE

On December 27, 2011, a true and correct copy of the attached document was served as follows:

By the Court's ECF System (Local Rule 5005(c)):

A.J. KUNG on behalf of Debtor DHILLON GROUP, LLC
ajkung@ajkunglaw.com, bbrown@ajkunglaw.com; paralegal7@ajkunglaw.com;
paralegal4@ajkunglaw.com; paralegal5@ajkunglaw.com; paralegal3@ajkunglaw.com;
fileclerk@ajkunglaw.com; paralegal1@ajkunglaw.com

U.S. TRUSTEE - RN - 11 USTPRegion17.RE.ECF@usdoj.gov

By U.S. Mail:

A copy of the attached document was placed in addressed envelope(s) and the envelope(s) containing the document were placed into the U.S. Postal Service mail on December 27, 2011 at San Diego, California; copies were mailed to:

None

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: December 27, 2011

/s/ George C. Lazar

George C. Lazar